

FILED IN THE
U.S. DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

NOV 19 2019

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DEPUTY
SPOKANE, WASHINGTON

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UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WASHINGTON

UNITED STATES OF AMERICA,

Plaintiff,

v.

RUSSELL PAUL NICKERSON,

Defendant.

2:19-CR-191-RMP

INDICTMENT

Vio: 18 U.S.C. § 472

Possession of Counterfeit
Currency (Count 1)

18 U.S.C. § 472

Passing Counterfeit Currency
(Count 2)

18 U.S.C. §§ 982(a)(2)(B), 492,

28 U.S.C. § 2461(c)

Notice of Criminal Forfeiture

The Grand Jury charges:

COUNT 1

On or about October 3, 2019, in the Eastern District of Washington, the
Defendant, RUSSELL PAUL NICKERSON, did, with the intent to defraud,
possess falsely made, forged, and counterfeit Federal Reserve Notes, to wit:
eighteen (18) counterfeit \$50 Federal Reserve Notes, bearing serial number

1 MG14318339B, totaling \$900.00 face value; and ten (10) \$20 counterfeit Federal
2 Reserve Notes, bearing serial number MB40946896F, totaling \$200.00 face value,
3 which RUSSELL PAUL NICKERSON knew to be falsely made, forged, and
4 counterfeit, all in violation of 18 U.S.C. § 472.
5

6
7 COUNT 2

8 On or about December 5, 2017, in the Eastern District of Washington, the
9 Defendant, RUSSELL PAUL NICKERSON, did, with the intent to defraud, pass
10 eight (8) falsely made, forged, and counterfeit \$50 Federal Reserve Notes, bearing
11 serial number MF09682731A, which RUSSELL PAUL NICKERSON knew to be
12 falsely made, forged, and counterfeit, to Aces Casino at 6301 N. Division Street,
13
14 Spokane, Washington, all in violation of 18 U.S.C. § 472.
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17 NOTICE OF CRIMINAL FORFEITURE

18 The violations alleged in this Indictment are hereby re-alleged and
19 incorporated herein by reference for the purpose of alleging forfeitures.

20 Pursuant to 18 U.S.C. § 982(a)(2)(B) upon conviction of an offense(s) in
21 violation of 18 U.S.C. § 472, as charged in this Indictment, the Defendant,
22 RUSSELL PAUL NICKERSON, shall forfeit to the United States of America, any
23 property constituting, or derived from, any proceeds obtained, directly or
24 indirectly, as the result of such violation.
25

26 Pursuant to 18 U.S.C. § 492 and 28 U.S.C. § 2461(c), upon conviction of an
27 offense(s) in violation of 18 U.S.C. § 472, as charged in this Indictment, the
28 Defendant, RUSSELL PAUL NICKERSON, shall forfeit to the United States of
America, all counterfeits of any coins or obligations or other securities of the

1 United States or of any foreign government; any articles, devices, and other things
2 made, possessed, or used in violation of 18 U.S.C. §§ 471, 472; and, any material
3 or apparatus used or fitted, or intended to be used, in the making of such
4 counterfeits, articles, devices, or things, found in the possession of the Defendants
5 without proper authority.

6 If any forfeitable property, as a result of any act or omission of the
7 Defendant(s):

- 8 a. cannot be located upon the exercise of due diligence;
9 b. has been transferred or sold to, or deposited with, a third party;
10 c. has been placed beyond the jurisdiction of the court;
11 d. has been substantially diminished in value; or
12 e. has been commingled with other property which cannot be divided
13 without difficulty,

14 the United States of America shall be entitled to forfeiture of substitute property
15 pursuant to 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 982(b)(1) or 28
16 U.S.C. § 2461(c).

17 DATED this 19 day of November, 2019.

18
19 A TRUE BILL

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23 
24 William D. Hyslop
25 United States Attorney

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27 
28 Earl A. Hicks
Assistant United States Attorney